Leonard W. Williamson, OSB #910020 VAN NESS WILLIAMSON LLP 960 Liberty St. SE, Suite 100 Salem, Oregon 97302 (503) 365-8800 l.williamson@vwllp.com

Bradley A. Benbrook\*
Stephen M. Duvernay\*
BENBROOK LAW GROUP, PC
701 University Avenue, Suite 106
Sacramento, California 95825
Telephone: (916) 447-4900
brad@benbrooklawgroup.com
steve@benbrooklawgroup.com

\*Pro hac vice

Attorneys for Plaintiffs

# UNITED STATES DISTRICT COURT

# DISTRICT OF OREGON

#### PORTLAND DIVISION

DALLIN MONTGOMERY; NICK HOLDWAY; KEVIN WALTERS; OREGON FIREARMS FEDERATION; and FIREARMS POLICY COALITION, INC.,

Plaintiffs,

v.

ELLEN ROSENBLUM, in her Official Capacity as Oregon Attorney General; and CASEY CODDING, in his Official Capacity as Superintendent of the Oregon State Police,

Defendants.

Case No.: 3:24-cv-01273-AN

PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO DEFENDANTS' 12(b)(6) MOTION TO DISMISS

> Fed. R. Civ. P. 6(b) and Local Rule 16-3

### **LOCAL RULE 7-1 CERTIFICATION**

Pursuant to L.R. 7-1(a), counsel for the plaintiff's certify that they conferred with counsel for the defendants prior to filing this motion. Defendants do not oppose this motion.

### **MOTION**

Plaintiffs move the Court pursuant to Fed. R. Civ. P. 6(b) and Local Rule 16-3 to extend the period of time to respond to the defendants' Motion to Dismiss under Fed. R. Civ. P. 12(b)(6) or alternative Summary Judgment. Plaintiffs' response is currently due on November 5, 2024. Plaintiffs request an extension of time. The parties have agreed to a briefing schedule. Plaintiffs' Opposing Brief will be due on December 6, 2024. Defendants' Reply will be due on December 30, 2024.

This motion is made in good faith and not for the purpose of delay, and there is good cause to grant the motion. The parties effectively used their prior time to properly brief the issues before the Court. Plaintiffs make this motion to ensure sufficient time to prepare an opposing brief in response to the defendants' motion to dismiss. Extending the deadlines will not intefere with the efficient management of this case, and the parties will not be prejudiced by the granting of this motion.

Dated: November 1, 2024

/s/ Leonard W. Williamson Leonard W. Williamson Oregon State Bar No. 910020 Van Ness Williamson LLP 960 Liberty St. SE, Suite 100 Salem, Oregon 97302 (503) 365-8800 l.williamson@vwllp.com Respectfully submitted,

Bradley Benbrook\*
California Bar No. 177786
Stephen M. Duvernay\*
California Bar No. 250957
Benbrook Law Group, PC
701 University Avenue, Suite 106
Sacramento, California 95825
(916) 447-4900
brad@benbrooklawgroup.com
steve@benbrooklawgroup.com

\*Pro hac vice

Attorneys for Plaintiffs